

United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Sevier River Resource 150 EAST 900 NORTH BICHFIELD, UTAH 84701



IN REPLY REFER TO

3809 (U-056)

MAR 22 1990

March 20, 1990

DIVISION OF OIL, GAS & MINING

Mr. D. Wayne Hedberg State of Utah, Natural Resources Division of Oil, Gas, and Mining 3 Triad Center, Suite 350 Salt Lake City, Utah 84180-1203

RE: Mining Plan, UT-056-2P, Georgia Pacific Corporation,

Sigurd Quarries

Dear Wayne:

In December, 1989, Michael Jackson and Doug Thurman conducted a surface compliance inspection on Georgia-Pacific Corporation's gypsum quarrying operations near Sigurd. A copy of the inspection report is enclosed for your files. On this inspection, discrepancies between the Bureau of Land Management approved plan and current mining and reclamation operations were discovered. We noted the following problems:

- 1. Reject wallboard is being dumped on unpatented mining claims on public land. In our approval, our authorization allowed that all litter, waste, and debris would be disposed in a landfill site.
- 2. Georgia-Pacific is reseeding reclaimed areas with a seed mixture that is different from the one that we authorized. The company stated that the seed mixture currently used for reclamation was recommended by staff of several regulatory agencies about 2 to 4 years ago. Georgia-Pacific does not have a written record of this authorization.

We would like to work with you under the new Memorandum of Understanding to resolve these problems and avoid different regulators giving Georgia-Pacific different operational and reclamation standards. A letter (enclosure) was sent to Georgia-Pacific on February 7, requesting a modification to their plan of operations. Subsequent to that date, we found a 1987 plan of operations submitted by Georgia-Pacific to DOGM which includes the revised revegetation procedure. In a recent phone conversation with Mr. Brent Bastian, Quarry Manager, Georgia-Pacific's response to our request should be forthcoming this week. A copy will be mailed to you when it is received in our office, and we should coordinate our response to the company.

In addition, Mr. Bastian has informed us that the Mayfield Quarry should be mined out this spring and reclamation should begin this year. Again, we should coordinate our efforts on this project area as well.

Please contact Doug Thurman, in my office, or Michael Jackson, in the District Office, if you have any comments or questions. We should complete at least one more inspection at the Sigurd quarries before September 30, and we should coordinate our work this time.

Sincerely,

Area Manager

Enclosure:

Soil and Revegetation Recommendations Letters to Georgia-Pacific, 12/18/90 and 2/5/90 Inspection Report, 12/14/90 CERTIFIED NO. 948965374

February 5, 1990

Mr. Brent Bastian Georgia-Pacific Corporation P.C. Box 80 Sigurd, Utah 84657

RE: UT-056-2P

Dear Mr. Bastian:

We would like to remind you that you need to submit a plan modification for your operations. Based on a recent field inspection in December, 1989, your operations do not conform to the approved plan of operations filed with this office in the following:

- 1. Dumping of reject wall board on mining claims.
- 2. The seed mixture used for reclamation of disturbed sites.

In a recent phone conversation, you stated that you would submit a request for modification to your plan of operation during the week of January 19th. My staff will assist you if requested. Your request to modify the plan of operation should include:

- Legal location, mining claim(s) number(s) and name(s), and number of acres disturbed at the dump site..
- 2. Volume and nature of material.
- 3. Method used to dispose of the material and reclamation at the site.

This letter does not authorize your dumping of the reject wall board, but only requests that you submit a plan modification. We will assess the plan modification to determine whether to permit dumping of the waste board.

At present, your mining operations are not in conformance with your approved plan of operations. As permitted under 43 CFR 3809.1-7(c)(1), you are requested to submit a modification to your plan within 30 days of receipt of this letter.

You provided a seed mixture to our office on December 21, 1989, that had been given to Georgia-Pacific. We requested that you try to identify what agency had presented this recommendation to you, so we could work with that agency to develop a recommended seed mixture. It will make your operations more cost effective to have only one mixture.

If you have any questions, please contact Doug Thurman in my office or Michael Jackson in the District Office.

Sincerely,

Area Manager

MJackson:ft:2-5-90

SURFACE INSPECTION COMPLIANCE REPORT

Date of Inspection: 12/13/89

Case Serial No.: UT-058-2P

Operator: Georgia Pacific Corporation

Project Description: Gypsum Mining

Legal Description: T. 22S., R. 1 W., T. 23 S., R. 2 W., SLM

District and Resource Area: Richfield DO, Sevier River RA

Inspector: Michael Jackson, District Geologist

Date of Report: 12/14/89

REPORT NARRATIVE (REFERENCE STIPULATIONS BY NUMBER OR TITLE)

On this date, Doug Thurman (Sevier River Resource Area) and I inspected Georgia-Pacific mining operations with Brent Bastian (Quarry Manager). Documentation of any previous inspections is not found in the case file.

Georgia-Pacific holds four mining claim blocks and each was visited during the inspection.

In the plan of operations, one block consists of Western 31, 41, 42, and 46 in SW1/4 Sec. 7, T 23 S., R. 1 W. On notice, UT-058-14N, the two claims in the SW1/4SW1/4 Sec. 7, are Western #40 and #41 (UMC 53605 and 53606). On the mining claim microfische (Report Date October 13,1989), only Western 31, 40, and 41 are listed. Western #31 has surface disturbance with existing quarry, but it is presently inactive. Georgia-Pacific does plan to mine on this claim in the future.

In the S1/2 Sec. 8, T. 23 S., R. 1 W., King Meadow # 5, 6, 7, 8, 10, 11, 12, and 15 mining claims (UMC 53579-53586) are inactive. Surface disturbance appears to have been only on King Meadow #5-8, and reclamation including reshaping, ripping and reseeding, // are in progress. I told Brent Bastian that reseeding should occur in the fall months as stipulated in the approval letter for the plan of operations. He will provide us with the seed mixture that has been used in the past reclamation. He stated that someone from BLM and Bureau of Reclamation had told him the mixture to use in an inspection about 3 years ago. He had also been instructed to fertilize the soil, which Doug Thurman stated is probably an unnecessary cost. I informed him to use the approved seed mixture in the plan, unless otherwise directed by Sevier River Resource Area staff. Doug Thurman stated he would

review the seed mixture. According to the approved plan, Georgia-Pacific had stated that it would consult with the Soil Conservation Service to develop an appropriate seed mixture. Depending on SRRA staff assessment of the seed mixture and what is required of the company in the future, this stipulation can probably be waived. The approved plan seed mixture should be used unless it is determined a better mixture would increase revegetation density and diversity.

In W1/2 Sec. 5, T. 23 S., R. 1 W., Western #14-21 mining claims (UMC 53596-53603) have pre-1981 surface disturbance according to Brent Bastian, except for one reclaimed quarry location on Western #20. Georgia-Pacific has completed mining on the mining claim block.

Georgia-Pacific is dumping waste wall boards on this block of mining claims. Exact location was not determined, but an approximate location is on Western #21. The wall board is defective, reject product. The company dumps the waste board on the side, rips the wall board, and covers with shale. I told Brent Bastian that this acitivity is in noncompliance with stipulations in the approved plan. He stated that he believed that the company had permission to dump this material and would check his files and with corporate headquarters. He stated that he would respond in a few days and provide a legal location for our records.

In SW1/4 Sec. 13 and NE1/4NW/14, Sec.24, T. 22 S., R. 1 W., Gabus #1-4 mining claims (UMC 53573-53576) have current mining activity, which is located on Gabus #2 or 3. This should be mined out in the near future and the quarry will probably be re-located on Gabus #4. We inspected an area that had been reclaimed on Gabus #2. It is reshaped and has been reseeded but only halogeeton is growing on the soil. Revegetation will havery difficult on this gypsum-bearing soil. The mined areas are reshaped, but the cover consist of shale and gypsum, which is not very good soil.

Another dump is located on this mining claim block. Again, the same problem exists as discussed above.

Georgia-Pacific appears to be conducting a gypsum mining operation that is not causing undue or unnecessary degradation of public lands, except for dumping of waste board. This may not be a problem and I decided for a response from Brent Bastian on any prior permission that may have been granted by the BLM. The waste board probably is not causing any environmental damage, but an investigation will need to be made to determine whether to allow this dumping to continue. If so, their plan will need to be amended. Although, no documented inspections have been made in 8 years, Georgia-Pacific has been reclaiming mined out areas.

In the approval letter for the plan, March 31, 1981, Georgia-Pacific was stipulated to consult with the BLM concerning mining

plans on Gabus #1 and Western #15 and 17 due to populations of $\frac{Townsendia}{A}$ aprica, which in 1981 was listed as threatened and endangered. According to Doug Thurman, $\frac{T.}{A}$ aprica is no longer a T & E species. We should document this in the case file.

Georgia-Pacific has probably not posted the BLM on all minor modifications in their plan. I informed Brent Bastian to notify us of any changes to their plan. I told him that we would send a copy of the plan and approval letter to him since he does not have a copy. We need to monitor this operation at biannually in the future.

Inspector

Authorized Officer

STAFF REPORT

Author: Michael Jackson

Date: 12/21/89

Subject: Plan of Operations, UT-058-2P, Georgia-Pacific

Corporation, Sigurd Plant

Mr. Brent Bastian visited me at the District Office. He stated that he had checked with Frank Moody in their corporate office in Atlanta, Georgia, about the seed mixture and waste board dumping. They could not find any written authorization for the dumping of reject board, but they felt they had received verbal approval. I told him that he should submit a written, amendment to modify their plan of operations. We would then evaluate the amendment and take appropriate action. If we consider it a minor amendment then we would just accept the change. If we consider it a major amendment, then we would have to amend the EA. Fither way we should have Fhil Zieg, Watershed and Hazardous Material Coordinator, investigate the dumping.

The seed mixture that G-P is using for revegetating reclaimed sites is attached. It was developed for their Mayfield Quarry. He does not what agency Frank R. Jensen represents. Brent Bastian said he would check to see if he could find out what agency gave him the seed mixture. The claims are located on our surface, and he should use a mixture that we require. But, we should also coordinate with other involved agencies.

G-P will submit an amendment, and we can evaluate what is needed at that time.

michael Jackson

RECFIVE.

DEC 2 1 1989

Bureau of Land Management THE Soil and Revegetation Recommendations Georgia Pacific Corporation Mayfield Quarry, DOE/039/006

Frank R. Jensen, Soils Specialist

Recommended Seed Mixture for All Areas

Type		the Mane
1700		Lbs./Acre
Crested Wheatgrass		8 .
Indian Ricegrass		4
Rabbitbrush		2
Big Sagebrush		2
Fourwing Saltbrush		2
Shadscal e :		2
	Total	20

Recommended Seedbed Preparation/Seeding

- 1. Get some topsoil material back onsite.
- Rip areas 6" deep to prepare seedbed. 2.
- Broadcast seed, then harrow or rake in to cover 1/4"-1/2" deep (preferably in the fall). 3.
- Broadcast fertilizer over area 200 lbs./acre diammonium phosphate 18-46-0.

Native Vegetation Onsite

11-52-0

Utah Juniper Indian Ricegrass Horsebrush Mormon Tea Shadscale Matchbrush Rabbitbrush Cliffrose Birchleaf Mt. Mahogany

Vegetation ground cover - about 15 percent

DEC 2 1939

clj 1243R/2



December 18, 1989

Mr. Brent Bastian Georgia-Pacific Corporation P.O. Box 80 Sigurd, Utah 84657

Dear Mr. Dastian:

Thank you for your assistance in the inspection made by Doug Thurman (Sevier River Resource Area) and Michael Jackson (Richfield District Office). We appreciate your time and effort. You should expect inspections to be conducted at least twice a year in the future.

Enclosed is a copy of the Plan of Operations that was submitted to our office in 1981, and the approval letter that authorized the operations. You are requested to notify us of any changes and modifications to this plan as required under the 43 CFR Surface Management Regulations. Major modifications must be approved by the Richfield District Manager. Please refer to case file UT-058-2P in any correspondence with regard to this Plan of Operations.

As noted during our inspections, concerns were raised about the dumping of reject wall board on your mining claims at two locations. As requested, please submit to us any written authorization that you may have for this dumping.

Also, please notify us about the seed mixture that you have been using for revegetation. We will review this mixture and provide a recommendation on a mixture to use in the future, if necessary.

In 1984, we received from Georgia-Pacific Corporation a Notice that was assigned case file UT-058-14N. The operations described in this Notice are in conformance with your Plan of Operations, UT-058-2P. Thus, case file UT-058-14N will be closed by transferring this Notice to case file UT-058-2P. Closing this case file does not release Georgia-Pacific Corporation from surface management and reclamation requirements. This action only consolidates cur records into one case file and your operations are still authorized under the Plan, UT-058-2P.

Again, thank you for your cooperation in the inspection and in the matter discussed in this letter. If you have any questions, please contact Michael Jackson

Sincerely,

Townek Kita Area Manager

cc: Copies of:

Plan of operations, UT-058-20 Approval letter, Harch 31, 1981 Notice, UT-058-14N

MJackson:ft:12-18-89